

1  
2  
3  
4  
5  
6  
7 BEFORE THE INSURANCE COMMISSIONER  
8 OF THE STATE OF WASHINGTON

9  
10 In the Matter of the Application  
11 regarding the Conversion and  
12 Acquisition of Control of Premera Blue  
13 Cross and its Affiliates.

No. G 02-45

JOINT MOTION FOR ORDER  
REGARDING FILING AND  
DISCLOSURE PROCEDURES

14 PREMERA and Premera Blue Cross ("Premera") have been authorized by the OIC  
15 Staff and by each of the Intervenors herein (collectively, the "Moving Parties") to sign this  
16 Joint Motion for Order regarding Filing and Disclosure Procedures ("Motion") on their  
17 behalf. The Moving Parties request that, because of the anticipated filing of certain  
18 documents this week, the Commissioner decide the Motion on an expedited basis.

19 This Motion requests that the Commissioner enter an Order Regarding Filing and  
20 Disclosure Procedures in the form attached hereto ("Order").

21 The Motion and the Order are needed because documents that may contain  
22 Attorneys' Eyes Only and/or Confidential Information, as those terms are defined in the  
23 Eighth Order, are expected to be filed this week and in the upcoming weeks. The Moving  
24 Parties want to ensure that there is a clear, expeditious, and straightforward approach to  
25 dealing with the filing, distribution, designation, and publication of such documents.

1 The proposed procedures are very similar to those that have been previously  
2 ordered in connection with pre-hearing discovery (the Commissioner's Eighth Order) and  
3 in regard to certain other filings (the Commissioner's Seventeenth Order and the  
4 Commissioner's Twenty-fifth Order). The Moving Parties believe that it will be  
5 advantageous to all -- the Commissioner, the public, and the Moving Parties -- to have  
6 generalized procedures that cover these documents set forth in one order.

7 The Moving Parties have also authorized the undersigned to represent that, if the  
8 Commissioner believes that the Motion can be decided without oral argument and the  
9 Order entered as proposed, they do not have any objection to the Commissioner entering  
10 the Order without a hearing or oral argument.

11 DATED this 24<sup>th</sup> day of February, 2004.

12  
13 PRESTON GATES & ELLIS LLP

14  
15 By 

16 Thomas E. Kelly, Jr., WSBA # 05690  
17 Attorneys for PREMERA  
18 and Premera Blue Cross  
19  
20  
21  
22  
23  
24  
25